

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

**SUMMARY OF SECOND MONTHLY FEE STATEMENT OF GROOMBRIDGE, WU,
BAUGHMAN & STONE LLP AS SPECIAL COUNSEL TO THE DEBTORS FOR THE
PERIOD FROM JUNE 1, 2023 THROUGH AND INCLUDING JUNE 30, 2023**

Name of Applicant: Groombridge, Wu, Baughman & Stone LLP
("GWBS")²

Authorized to Provide
Professional Services to: **Debtors**

Date of Retention: June 9, 2023

Period for which compensation and reimbursement is sought: June 1, 2023 through June 30, 2023

Amount of Compensation sought as actual, reasonable and necessary: \$265,649.20 (80% of \$332,061.50)

Amount of Expense Reimbursement
sought as actual, reasonable and
necessary: \$83,791.36

This is a(n): monthly interim final application

The total time expended for fee application preparation is approximately 0.00 hours and the corresponding compensation requested is approximately \$0.00.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number include: DeCurtis Holdings LLC (2384) and DeCurtis LLC (9241). The location of the Debtors' service address in these Chapter 11 Cases is 3208 East Colonial Drive, Suite C190, Orlando, FL 32803.

² Capitalized terms used but not otherwise defined in this summary have the meanings ascribed to such terms below.

Previously Filed Applications:

Date Filed	Period Covered	Requested Fees	Requested Expenses	Approved Fees (80%)	Approved Expenses (100%)
7/5/2023	April 30, 2023 – May 31, 2023	\$106,135.00	\$19.22	\$84,908.00	\$19.22

COMPENSATION BY PROFESSIONAL FOR THE COMPENSATION PERIOD
JUNE 1, 2023 THROUGH AND INCLUDING JUNE 30, 2023

Name of Professional Person	Initials of Professional Person or Other Reference ID Used in the Application for the Professional Person	Position, Department, and Number of Years in that Position	Year of Admission	Hourly Billing Rate (including changes)	Total Billed Hours	Total Compensation
Nicholas P. Groombridge	NPG	Partner, IP Litigation, 20+ years	1989	\$2,025.00	38.30	\$77,557.50
Jennifer H. Wu	JHW	Partner, IP Litigation, 9 years	2004	\$2,025.00	15.40	\$31,185.00
Partner Total						54.30 \$108,742.50
Daniel J. Klein	DJK	Counsel, IP Litigation, 7 months	2011	\$1,350.00	23.00	\$31,050.00
Counsel Total						23.00 \$31,050.00
Allison C. Penfield	ACP	Associate, IP Litigation, 5 years	2016	\$1,210.00	158.90	\$192,269.00
Associate Total						158.90 \$192,269.00
Staff/Paraprofessional Total						0.00 \$0.00
Grand Total: \$332,061.50						
Blended Rate: \$1,652.50						

**COMPENSATION BY PROJECT CATEGORY FOR THE COMPENSATION PERIOD
JUNE 1, 2023 THROUGH AND INCLUDING JUNE 30, 2023**

Project Category (Examples)	Task Code	Total Hours	Total Fees
Fact Investigation/Development	L110	11.60	19,763.50
Analysis/Strategy	L120	84.50	129,403.50
Settlement/Non-Binding ADR	L160	4.00	4,840.00
Other Cases Assessment, Development and Administration	L190	3.20	4,442.50
Court Mandated Conferences	L230	3.80	4,598.00
Other Written Motions and Submissions	L250	74.80	96,050.00
Written Discovery	L310	4.30	5,529.00
Written Motions and Submissions	L430	35.30	50,374.00
Other Trial Preparation and Support	L440	5.40	6,534.00
Trial and Hearing Attendance	L450	8.70	10,527.00

EXPENSE SUMMARY FOR THE COMPENSATION PERIOD
JUNE 1, 2023 THROUGH AND INCLUDING JULY 24, 2023

Expense Category	Service Provider (if applicable)	Total Expenses
Travel-Hotels/Meals/Transportation		\$3,759.97
Copy Services	TransPerfect	\$2,611.52
Professional Services ³	Schulte Roth & Zabel LLP	\$66,326.56
Deposition Transcript Services	Veritext	\$11,093.31
	Total:	\$83,791.36

³ Groombridge, Wu, Baughman, & Stone LLP retained Schulte Roth & Zabel LLP as counsel to advise with respect to bankruptcy issues implicated as part of Groombridge's role as section 327(e) counsel to the Debtors, including, but not limited to, advice in connection with Groombridge's retention in these cases.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:) Chapter 11
)
DECURTIS HOLDINGS LLC, <i>et al.</i> , ¹) Case No. 23-10548 (JKS)
)
Debtors.) (Jointly Administered)
)
) Obj. Deadline: August 24, 2023 at 4:00 p.m. (ET)

**SECOND MONTHLY FEE STATEMENT OF GROOMBRIDGE, WU, BAUGHMAN &
STONE LLP AS SPECIAL COUNSEL TO THE DEBTORS FOR THE PERIOD FROM
JUNE 1, 2023 THROUGH AND INCLUDING JUNE 30, 2023**

In accordance with (i) the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 174] (the “Interim Compensation Order”); (ii) sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court of the District of Delaware (the “Local Bankruptcy Rules”), Groombridge, Wu, Baughman & Stone LLP (“GWBS”), as Special Counsel to the Debtors, hereby submits this monthly fee statement (this “Monthly Fee Statement”) seeking compensation for professional services rendered in the amount of \$265,649.20 (80% of \$332,061.50) and reimbursement of actual and necessary expenses incurred in the amount of \$83,791.36, for a total of \$349,440.56 for the period from June 1, 2023, through and including June 30, 2023 (the “Statement Period”). In support of the Monthly Fee Statement, GWBS submits the declaration of Nicholas P. Groombridge, a partner at GWBS (the “Groombridge Declaration”), which is attached hereto as **Exhibit C** and incorporated herein

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number include: DeCurtis Holdings LLC (2384) and DeCurtis LLC (9241). The location of the Debtors’ service address in these Chapter 11 Cases is 3208 East Colonial Drive, Suite C190, Orlando, FL 32803.

by reference. In further support of the Monthly Fee Statement, GWBS respectfully represents as follows:

Jurisdiction

1. The United States Bankruptcy Court for the District of Delaware (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2) and GWBS confirms its consent pursuant to Local Bankruptcy Rule 9013-1(f) to the entry of a final order by the Court in connection with this Monthly Fee Statement to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.
2. Venue in this Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.
3. The statutory bases for the relief requested herein are Bankruptcy Code sections 330 and 331, Bankruptcy Rule 2016 and Local Bankruptcy Rules 2016-1 and 2016-2.

Background

4. On April 30, 2023 (the “Petition Date”), the Debtors filed voluntary petitions for relief pursuant to chapter 11 of the Bankruptcy Code in this Court.
5. The Debtors continue to manage and operate their business as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.
6. On May 19, 2023, the United States Trustee for Region 3 (the “U.S. Trustee”) filed a statement that the U.S. Trustee was unable to form an official committee of unsecured creditors [Docket No. 126].

GWBS's Retention

7. On May 12, 2023, the Debtors filed the *Application of Debtors to Retain and Employ Groombridge, Wu, Baughman & Stone, LLP as Special Counsel to the Debtors and Debtors in Possession Pursuant to Section 327(e) of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016, and Local Rule 2014-1, Effective as of the Petition Date* [Docket No. 93] (the “GWBS Retention Application”), which was granted by an order of this Court dated June 9, 2023 [Docket No. 227] (the “GWBS Retention Order”)

Interim Compensation Order

8. On May 26, 2023, the Court entered the Interim Compensation Order. The GWBS Retention Order authorizes the Debtors to compensate and reimburse GWBS in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules and the Interim Compensation Order.

Relief Requested

9. GWBS submits this Monthly Fee Statement for (i) payment of reasonable compensation for actual, reasonable and necessary professional services performed by GWBS as special counsel to the Debtors during the Statement Period and (ii) reimbursement of actual, reasonable and necessary expenses incurred by GWBS in connection with rendering such services to the Debtors during the Statement Period.

10. GWBS has received no payment and no promises for payment from any source for services provided or to be provided in any capacity whatsoever in connection with the chapter 11 cases other than in accordance with the GWBS Retention Order and the Interim Compensation Order.

11. Pursuant to Bankruptcy Rule 2016(b), GWBS has neither shared nor agreed to share

(i) any compensation it has received or may receive with another party or person other than with the partners, counsel and associates of GWBS or (ii) any compensation another person or party has received or may receive.²

Reservation of Rights

12. To the extent time for services rendered or charges for disbursements incurred in connection with the Statement Period were not processed prior to the preparation of this Monthly Fee Statement, or GWBS has for any other reason not sought compensation or reimbursement of expenses herein with respect to any services rendered or expenses incurred during the Statement Period, GWBS reserves the right to request additional compensation for such services and reimbursement of such expenses in a future monthly fee statement and/or interim fee application.

No Prior Request

13. No prior application has been made in this Court or in any other court for the relief requested herein for the Statement Period.

Notice

14. Notice of this Monthly Fee Statement will be provided to the Notice Parties, as defined in the Interim Compensation Order, in accordance with such order.

² In accordance with Local Bankruptcy Rule 2016-2(e)(iii), GWBS has not charged more than \$0.10 per page for black and white photocopies, has not charged more than \$0.80 per page for color photocopies, has not charged for incoming facsimile transmissions and has not charged more than \$0.25 per page for outgoing facsimiles. GWBS does not surcharge for computerized research.

Conclusion

WHEREFORE, GWBS respectfully requests, in accordance with the Interim Compensation Order, (i) interim allowance of \$332,061.50 as the total compensation for professional services rendered during the Statement Period; (ii) compensation in the amount of \$265,649.20, which is equal to 80% of the total reasonable compensation for actual, necessary legal services that GWBS performed during the Statement Period; and (iii) allowance and payment of \$83,791.36 for the actual and necessary costs and expenses incurred by GWBS in connection with such services during the Statement Period.

Dated: August 3, 2023
New York, New York

/s/ Nicholas P. Groombridge

Nicholas Groombridge

Jennifer H. Wu

Danielle Rosenthal

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Special Counsel to the Debtors and Debtors in Possession